

ENSV FY06  
Inspection Transmittal Form

Today's Date:  
03/20/2006

OK  
3/20/06 JWS  
3/20/06

**INSPECTION ACTIVITY**

Media RCRA	Type of Inspection CEI	Targeting Rationale LQG (KS,MO,NE)	Compliance Officer Aycock, J	Inspection Date 02/23/2006
Inspector Lewis- J	Activity # 			

**FACILITY INFORMATION**

Facility Name Modine Manufacturing	ID Number MOD062439351	NAICS/SIC Code 		
Address 221 Sunset Drive	City Camdenton	County Camden	State MO	ZIP 64801
Facility Activity 				

**INSPECTION FINDINGS**

NOV/NOPF Issued? ☐ Yes ☒ No ☐ N/A

Potential SNC? ☐ Yes ☒ No ☐ N/A

Preliminary Findings (briefly list regulatory deficiencies)

Comments

**MULTIMEDIA FINDINGS**

MM Participating Program* 	MM Level 	MM Type 	Potential EJ? <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
MM Screening completed? <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	SBREFA handout provided? <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A		
If yes, was MM Screening Checklist forwarded? <input checked="" type="radio"/> Yes <input type="radio"/> No			
If yes, who? > <input type="checkbox"/> CAA <input type="checkbox"/> EPCRA/TSCA <input type="checkbox"/> SPCC <input checked="" type="checkbox"/> CWA <input type="checkbox"/> UST <input type="checkbox"/> PWS <input type="checkbox"/> UIC <input type="checkbox"/> Wetlands <input type="checkbox"/> RCRA <input type="checkbox"/> CFC <input type="checkbox"/> EJ <input type="checkbox"/> All			

A=CAA, W=CWA, R=RCRA, E/T=EPCRA/TSCA,  
U=UST, C=CFC, S=SPCC, U-I=UIC, Wet., PWS, All

461029



RCRA RECORDS

A004

3/21  
3/28/06

REPORT OF RCRA COMPLIANCE INSPECTION

AT

**MODINE MANUFACTURING COMPANY**

**221 Sunset Drive  
Camdenton, Missouri 65020  
(573) 346-5693**

EPA ID Number: MOD062439351

ON

February 23-24, 2006

BY

**U.S. ENVIRONMENTAL PROTECTION AGENCY**

**Region VII  
Environmental Services Division**

**INTRODUCTION**

At the request of the Air, RCRA, and Toxics Division (ARTD), A Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection was performed at Modine Manufacturing Company in Camdenton, Missouri on February 23-24, 2006. The inspection was conducted under the authority of Section 3007(a) of RCRA, as amended. This inspection was conducted as a Level B Multi-Media Inspection and the Multi-Media Screening Checklist is included as attachment 1.

**PARTICIPANTS**

Modine Manufacturing Company (Modine):  
Dan Davis, Manufacturing Engineer (2 years)

U.S. Environmental Protection Agency (EPA):  
Jamal Lewis, Environmental Protection Specialist

## INSPECTION PROCEDURES

Modine is located in Camdenton, Missouri. Prior to the inspection, I was unable to drive completely around the facility. From the reconnaissance that I conducted, I did not observe any storage or disposal areas that would be of specific concern for this inspection. I arrived unannounced at the Modine office on the morning of Thursday, February 23, 2006. I introduced myself to the receptionist on duty and showed her my credentials. She informed me that I would want to speak with Mr. Dan Davis, Manufacturing Engineer. The receptionist contacted Mr. Davis and directed me to a seat to await his arrival. Upon Mr. Davis' arrival, I presented him with my credentials and informed him that I was on-site to conduct an inspection of Modine's practices for handling hazardous wastes. Mr. Davis was very agreeable and we proceeded to a conference room where the inspection began. Mr. Davis stated that Mr. John Blatchford is responsible for all waste management activities at the Modine facility. He continued to state that Mr. Blatchford was out of the office for the week. I explained to Mr. Davis the right to make confidentiality claims and I informed him that there would be a Confidentiality Notice at the end of the inspection to make these claims if he so desired. I provided Mr. Davis with a copy of U.S. Federal Code 1001 and 1002 concerning false statements and false documents. He was also provided with a copy of Section 3007 of the Resource Conservation and Recovery Act, as amended, that defines the authority to conduct this type of inspection. Mr. Davis read these and returned them to me.

During the inspection, discussions consisted of facility operations, wastes generated, and waste management practices. I was provided with a copy of Modine's site map to aid me during the inspection, *see Attachment 5*. Mr. Davis confirmed the contact information on the EPA Handler Information Report, *see Attachment 2*, for Modine. During my review of the on-site records, I reviewed several Uniform Hazardous Waste Manifests from 2003 to the present that listed several characteristic wastes. I requested copy of a manifest to aid me during my visual inspection, *see Attachment 7*. After a description of the activities on-site by Mr. Davis, I conducted a visual inspection of the facility. Mr. Davis accompanied me during the entire visual inspection. At the conclusion of the inspection on February 24, 2006, my findings and recommendations were summarized with Mr. Davis. I provided him with copies of a Confidentiality Notice and a Document of Receipt. Mr. Davis made a confidentiality claim on behalf of Modine at that time. The Document Receipt was signed and dated by Mr. Davis as acknowledgment of receipt, *see Attachments 3-4*.

## FINDINGS AND OBSERVATIONS

### 1. Facility Description

Modine manufactures heat transfer equipment, using aluminum and steel, for off-road, heavy industrial equipment. Their customers include John Deere and Caterpillar. Modine facility has been at this location since the 1960's. The site first opened as Dawson Industries. Mr. Davis was not sure of the date that Sunstrand Manufacturing purchased Dawson Industries. Modine purchased the property from Sunstrand

Manufacturing on October 19, 1990. Throughout its history, the facility has maintained the same line of business. Modine employs approximately 300 full-time employees. Modine operates Monday through Friday utilizing three (3) shifts and two (2), twelve (12) hour shifts Friday through Sunday. The offices operate Monday through Friday from 8:00AM to 5:00PM

### **RCRA Status**

Modine last notified as a Small Quantity Generator of Hazardous Waste on September 27, 2004, *see Attachment 6*. The wastes codes listed on the notification are from wastewater treatment sludge generated from the on-site wastewater treatment system. During my inspection, I determined through records review, hazardous waste determinations, and wastes accumulated on-site that Modine is currently operating as a Non-Generator of Hazardous Waste. Mr. Davis provided waste analysis reports and Material Safety Data Sheets (MSDS) as supporting documentation of non-hazardous waste determinations. He also provided a copy of the hazardous waste manifest for the last shipment of hazardous waste, *see Attachment 7*. Modine regularly generates the following non-hazardous wastes: wastewater treatment sludge, used oil, and fluorescent bulbs. My observations are discussed below.

### **3. Facility Processes and Waste Streams**

As stated above, Modine manufactures heat transfer equipment using aluminum and steel and operates a wastewater treatment system. The manufacturing process begins with aluminum or steel sheets that are run through a stamp machine to press out pieces. The pressed pieces are formed into various parts. The parts are welded together to form the final part. After welding, the parts are sprayed with a water/powder mixture (flux). The final part is then heat-treated in a furnace. The baked flux powder remains on the finished product. Some of the finished parts are then powder-coat painted. The finished parts are then shipped to customers.

Wastes generated and their waste determinations are described below.

#### **3.1 Wastewater Treatment Sludge**

Modine operates a wastewater treatment system that adjusts the pH of process wastewater prior to discharge. The D006,D007 hazardous waste codes listed on the notification are from the residual sludge taken from the wastewater treatment system, *see Attachment 6*. When I questioned Mr. Davis about the last shipment of hazardous waste sludge, he stated that the sludge is not hazardous. I questioned Mr. Davis about how the hazardous waste determinations were made. He stated that the sludge was sampled and sent off for analysis. He then provided me with the results of the analysis, *see Attachment 8*. The analysis showed traces of cadmium and chromium that are below reportable concentrations.



### **3.2 Flux/Nocolok Furnace Waste**

As described above, a water/powder mixture (flux) is sprayed on the product to ensure a good brase. As the product moves through the process of being sprayed with flux, it is dried and sprayed several times to ensure proper coating. As the dried flux or nocolok residue accumulates, it is removed from the process line. I asked Mr. Davis if the nocolok is hazardous. He stated that the nocolok was non-hazardous. I questioned him about how the hazardous waste determination was made. He stated that the nocolok was sampled and sent off for analysis. He then provided me with the results of the analysis, *see Attachment 9*. Mr. Davis also provided me with a copy of the flux MSDS, *see Attachment 10*.

### **3.3 Universal Wastes and Used Oil**

As stated above, Modine generates used oil from the various hydraulic machines used in the facility. The used oil is stored in a 55-gallon drum labeled with the words "Used Oil." Onyx Environmental Services (Onyx) picks up the used oil for recycling when the drum is filled. Modine also generates approximately twelve (12) fluorescent bulbs per month. Mr. Davis stated that the bulbs are stored in the original boxes and picked up by Onyx for recycling. I asked Mr. Davis if the forklifts are serviced on-site and he said "yes." Mr. Davis continued by stating that a third party, Weise, services the forklifts on-site and all related materials are taken off-site. I asked Mr. Davis if Modine generated any used batteries and he said "yes." He stated that NiCd batteries from 2-way radios and other batteries are collected and recycled by Onyx. The facility was in compliance with all other universal waste requirements.

## **4. Other Observations**

I completed the Region 7 Multi-Media Screening Checklist, *see Attachment 1*. The checklist is to be forwarded to the Clean Water Act Branch.

## **CONCLUSION**

The RCRA Compliance Evaluation Inspection for Modine Manufacturing Company concluded on February 24, 2006. Mr. Dan Davis, Manufacturing Engineer, was provided with information concerning; Compliance Assistance, Small Business Resources, Aerosol Cans, Solvent Rags, Closed Containers, On-Site Burning of Used Oil, and various Security Awareness publications. I also provided him a copy of the Confidentiality Notice and a Document of Receipt. Mr. Davis made a confidentiality claim on behalf of Modine at that time, citing all information covered during the inspection, *see Attachment 3*. He explained that, as a company policy, all company information is to be handled as confidential. However, Mr. Davis notified me by email to state that the information covered during the inspection is not confidential, *see Attachment 11*. The Document of Receipt was signed and dated by Mr. Davis as acknowledgement of receipt, *see Attachment 3*. I reviewed all other applicable Missouri CESQG requirements and no

additional concerns were noted. The Missouri Department of Natural Resources Used Oil Checklist is included as attachment 13.



Jamal Lewis

Environmental Protection Specialist

Date: March 17, 2006

Attachments:

1. Multi-Media Inspection Checklist (2 pages)
2. Handler Information Report (1 page)
3. Confidentiality Notice (1 page)
4. Document of Receipt (1 page)
5. Facility Layout (1 page)
6. Hazardous Waste Notification (3 pages)
7. Hazardous Waste Manifest (1 page)
8. Sludge Analytical Report (3 pages)
9. Nocolok Analytical Report (2 pages)
10. Flux MSDS (5 pages)
11. Confidentiality Letter (1 page)
12. MDNR Used Oil Inspection Checklist (2 pages)

Photo Log (1 pages)

Photographs (2 pages/1 photograph)

# REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: MODINE MANUFACTURING COMPANY Inspector: JAMAL LEWIS  
 Facility Ownership: PRIVATE Primary Media: RCRA  
 Street: 221 SUNSET DR Inspector Phone Ext.: 7888  
 City: CAMDENTON State: MO Zip: 65020 Date: 23-24 FEB 06  
 Phone: 573-346-5693 Facility Contact: JOHN BLATCHFORD SIC/NAICS Code: 336391, 333415  
 Number of Employees: ~300 Work Hours/Shifts: M-F (3 SHIFTS) Facility Subject to OSHA regulations Yes ☒ No ☐

Main facility activity, major process chemical(s) & description: MANUFACTURE HEAT TRANSFER EQUIPMENT FOR HEAVY INDUSTRIAL OFF ROAD EQUIPMENT

(Check all that apply): painting/coating (water-based ☒, solvent-based ☐) , printing ☐ , reacting ☐ , formulating ☐ , distilling ☐ ,  
 water treatment ☐ , refrigeration ☐ , manufacturing ☒ , parts washers/degreasing (water-based ☐ , halogenated-based ☐ ,  
 non-halogenated-based ☐ , combustion (boiler, furnaces, oxidizers) ☒ plating (chrome ☐ , other ☐ ).

## ENVIRONMENTAL JUSTICE ( Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐  
 If yes, is facility less than 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ **Forward to EJ**

## EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ **Forward to EPCRA**  
 2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ **Forward to EPCRA**  
 3. Has the facility: **If any box in question 3 is marked - Forward to EPCRA**  
 a. Stored ≥500 lbs of ammonia ☐ , ≥100 lbs of chlorine ☐ , or ≥10,000 lbs of an industrial chemical ☐ , at any time over the last 2 years? ☐  
 b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐  
 c. Used ≥10,000 lbs of ammonia ☐ , chlorine ☐ , halogenated solvents ☐ , solvent-based paints ☐ , or solvents ☐ , or nitrated compound, over the last calendar year? ☐  
 d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐  
 4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ **Forward to TSCA and ask** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm \_\_\_\_\_ and percent of all equipment tested \_\_\_\_\_. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - **Get Photo**

## CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐  
 If yes, are all wastewater discharges permitted? Yes ☐ No ☐ **Forward to CWA**  
 2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☐ (stop) Yes ☒  
 If yes, are the discharges permitted by: State? ☐ , City? ☐ - If yes, Stop here. No ☐ **Forward to CWA**  
 If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☒ **Forward to CWA DOES HAVE PERMIT**  
 3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐  
 If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ **Forward to CWA**  
 4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: \_\_\_\_\_ (**Get Photo**) **Forward to CWA**  
 5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐  
 If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? \_\_\_\_\_ (**Get Photo**) **FWD to Wetlands**  
 No ☐ (stop) Yes ☐ - Identify location and timeframe \_\_\_\_\_

**SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)**

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ **Forward to UIC**  
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc.)? No ☒ (stop) Yes ☐ **Forward to PWS**  
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

**CLEAN AIR ACT (CAA) and CFCs**

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ **Forward to CAA**  
Source \_\_\_\_\_ (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☐ (stop) Yes ☒  
If yes, is equipment permitted? Yes ☒ No ☐ **Forward to CAA** Describe: \_\_\_\_\_
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ **Forward to CFC**  
If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company: \_\_\_\_\_
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ **Forward to EPCRA/RMP**
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ **Forward to CFC**

**RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)**

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☐  
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ **Forward to RCRA**
2. Is hazardous waste treated ☐, stored >90-days ☐, burned ☐, land filled ☐, put in surface impoundments ☐ or waste piles ☐?  
No ☐ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ **Forward to RCRA**
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. - exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☐

**Material Claimed To Be Non-Hazardous****How does the facility know these wastes are non-hazardous?**

- \_\_\_\_\_  
Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**
- \_\_\_\_\_  
Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**
- \_\_\_\_\_  
Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**
- \_\_\_\_\_  
Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**
- \_\_\_\_\_  
Testing, industry or manuf. info., MSDS, etc. ☐ ; None available ☐ **Forward to RCRA**

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☐ Yes ☐ **Forward to RCRA**  
Describe: \_\_\_\_\_ (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☐ Yes ☐ **Forward to RCRA**  
Describe: \_\_\_\_\_ (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☐ Yes ☐ **Forward to RCRA & EPCRA** Describe: \_\_\_\_\_ (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ **Forward to UST**
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ **Forward to UST**

**SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)**

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?  
No ☒ (stop) Yes ☐ Does the facility have a certified SPCC Plan? Yes ☐ No ☐ **Forward to SPCC**  
If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ **Forward to SPCC**  
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (Get Photo) **Forward to SPCC**

**ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)**

1. Does your facility have an EMS? No ☐ Yes ☒
2. Is the facility's EMS ISO 14001 certified? No ☐ Yes ☒

**\* PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS**



PROCEDURES for Inspectors performing Site Visits

If the facility wants to make a change, they must complete a Notification of Regulated Waste Activity form # MO780-1164, and send it to the Department of Natural Resources, Waste Management Program, PO Box 176, Jefferson City, MO 65102. The form can be found at [www.dnr.mo.gov/oac/forms/780-1164.pdf](http://www.dnr.mo.gov/oac/forms/780-1164.pdf)

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Lisa Haugen in ARTD/RESP.

JL

EPA RCRA ID Number: MOD062439351

Name of Company/Site: MODINE MFG CO  
Location of Site: 221 SUNSET DR  
CAMDENTON, MO 65020  
CAMDEN County  
03 State District

Land Type: Private

NAICS: 336391 - Motor Vehicle Air-Conditioning Manufacturing  
333415 - Air-Conditioning and Warm Air Heating Equipment an

Mailing Address: PO BOX 636  
CAMDENTON, MO 65020

Site Contact: JOHN BLATCHFORD  
Phone Number: 5733465693 3139  
Address: ~~PO BOX 636~~ SAME AS ABOVE  
~~CAMDENTON, MO 65020~~

Current Owner of Site: MODINE MFG CO  
Phone Number: (262) 636-1200  
Owner Type: Private

Current Operator of Site: MODINE MFG CO  
Phone Number: (262) 636-1200  
Operator Type: Private

TYPE(S) OF REGULATED ACTIVITY: Federal Small Quantity Generator  
~~Haz Waste Treater, Storer, Disposer, per EPA~~

Hazardous Wastes Handled: D002 D006 D007 D039

I 06/01/05 2 1st N 08/21/97 N 09/30/04 2

Certified by State/EPA on 06/01/05 by  
GARY A FAHL 09/27/04  
EHS OFFICER

Date of Site Visit: 23-24 FEB 06

Name of Inspector (Please print): JAMAL LEWIS  
(Check one): ☒ EPA R7 ENSV ☐ EPA R7 Contractor ☐ NOWCC/SEE Investigator

Signature of Inspector: Jamal Lewis



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

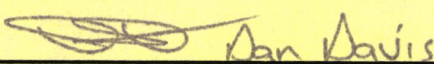
Facility Name MODINE MANUFACTURING COMPANY	
Facility Address 221 SUNSET DR. CAMDENTON, MO 65020	
Inspector (print) JAMAL LEWIS	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date 24 FEB 06

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date
 Dan Davis	2-24-06

Information for which confidential treatment is requested:

We want this information kept confidential in order  
to maintain our competitive position.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <u>MODINE MANUFACTURING COMPANY</u>
Facility Address <u>221 SUNSET DR. CAMDENTON, MO 65020</u>

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☐ Split Samples: YES ☐ NO ☐

Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ same as above Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1) MSDS - AL FLUX (NOCOLOK) - (5 PAGES)

2) FACILITY LAYOUT - (1 PAGE)

3) NOTIFICATION OF REGULATED WASTE ACTIVITY - (3 PAGES)

4) MSDS - POWDER PAINT - (4 PAGES)

5) ANALYTICAL REPORTS - (2 PAGES)

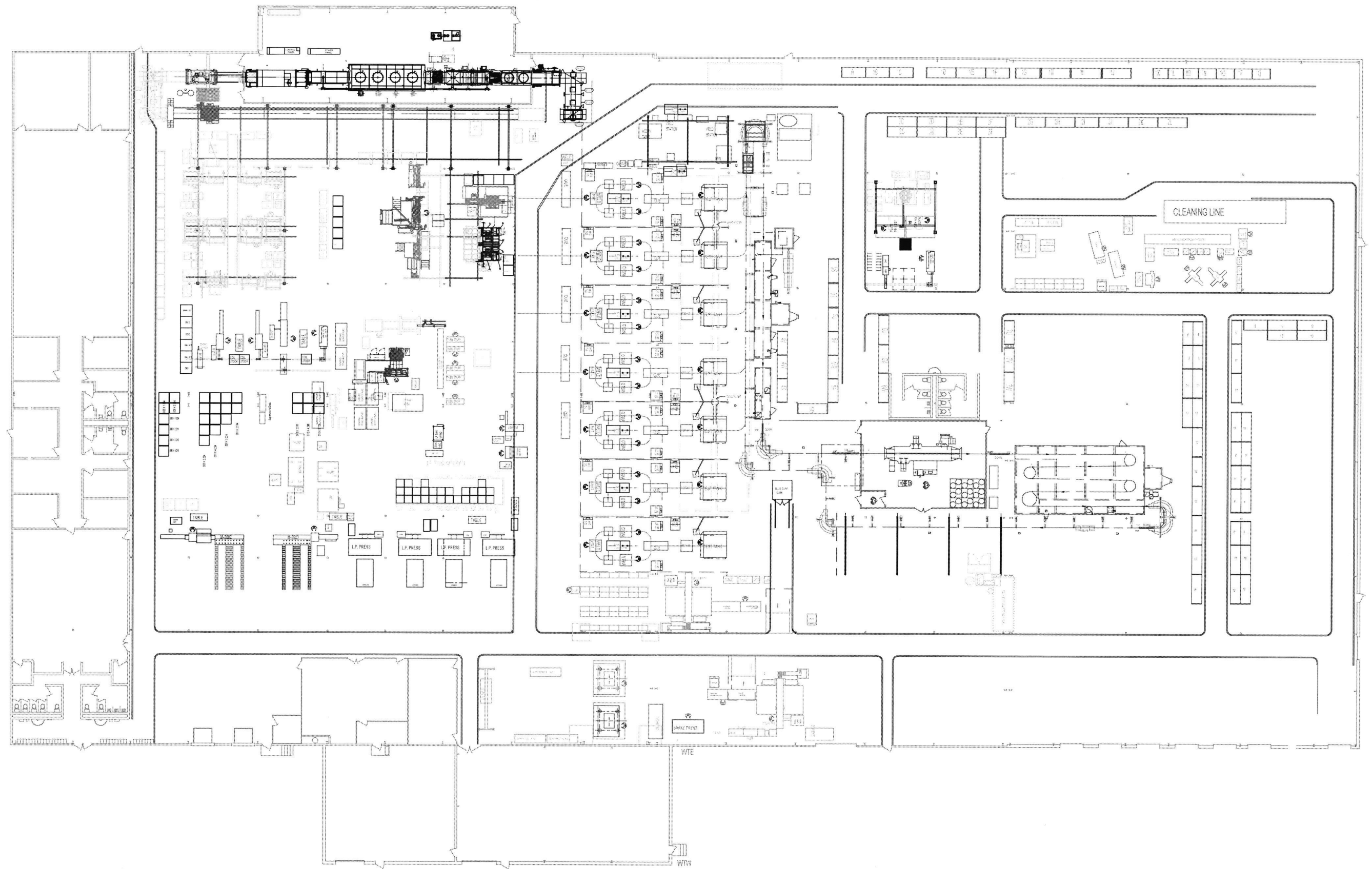
6) ANALYTICAL REPORT WITH EVIDENCE - (3 PAGES)

7) MANIFEST - (1 PAGE)

Facility Representative (print) <u>Don Davis</u>	Signature/Date <u>[Signature]</u> <u>2-24-06</u>
Inspector (print) <u>JAMAL LEWIS</u>	Signature/Date <u>[Signature]</u> <u>24 FEB 06</u>
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev: 1/20/93)







**Certified Mail 7160 3901 9844 6562 4920**  
**Return Receipt Requested**

September 27, 2004

Missouri Department of Natural Resources  
Hazardous Waste Program  
P.O. Box 176  
1738 Elm Street  
Jefferson City, MO 65101

To Whom It May Concern:

Enclosed is a Notification of regulated Waste Activity form for Modine Manufacturing Company, Camdenton, MO (EPA ID # MOD 062 439 351). This form is being sent to update the address information for the facility. The address change is a result of the new Camden county emergency telephone system (911 system) and not a physical move of the facility. If you have any questions, please contact me at (262) 636-1649 or at the letterhead address.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom S. Sanicola". The signature is fluid and cursive.

Thomas S. Sanicola  
Principal Environmental Engineer

cc: Modine Manufacturing Company – Camdenton  
file(2)

Modine Manufacturing Company  
1500 DeKoven Avenue  
Racine, Wisconsin 53403

Telephone 262-636-1200  
FAX 262-636-1424



All new registrations require a \$100 initial fee. Registrations without this fee will not be processed. The fee is not required if only updating information to existing and active registration.



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM  
P.O. BOX 176, 1738 E. ELM  
JEFFERSON CITY, MISSOURI 65101  
(573) 751-3176

NOTE: \$100.00 fee for new registration and reactivating registrations.

FORM MUST BE  
COMPLETE IN ITS  
ENTIRETY, OR IT WILL  
BE RETURNED.

### NOTIFICATION OF REGULATED WASTE ACTIVITY

#### I. Type of Notification

☐ A. New Notification

☐ Permanent

☐ Temporary (Available for MO facilities only)

Effective Date of Temporary ID

☒ B. Subsequent Notification

EPA #

MO #

#### II. Name of Installation (Company or Specific Site Name)

#### III. Location of Installation (Physical Address or directional description not P.O. Box or Route Number)

Street

City or Town

State

ZIP Code

County Code

County Name

#### IV. Installation Mailing Address (All correspondence will be sent to this address)

Street or P.O. Box

City or Town

State

ZIP Code

#### Installation Contact (Person to be contacted regarding waste activities at the site)

Name (last)

(first)

Job Title

Phone Number (area code and number)

Extension

#### VI. Ownership (Make copies of this section for multiple ownership)

##### A. Name of Installation's Legal Owner (Business Owner)

Street, P.O. Box, or Route Number

City or Town

State

ZIP Code

Phone Number

Extension

B. Change of Installation Owner Indicator

☐ Yes

☒ No

Date of Change

##### C. Installation owner type (Mark one)

☒ Private

☐ County

☐ District

☐ Federal

☐ Indian

☐ Municipal

☐ State

☐ Other

##### D. Name of Property's Legal Owner

Street, P.O. Box, or Route Number

City or Town

State

ZIP Code

Phone Number

Extension

E. Change of Property Owner Indicator

☐ Yes

☒ No

Date of Change

##### F. Property owner type (Mark one)

☒ Private

☐ County

☐ District

☐ Federal

☐ Indian

☐ Municipal

☐ State

☐ Other

**VII. Type of Regulated Waste Activity (only mark the following sections that apply)****A. HAZARDOUS WASTE ACTIVITIES**1. **Generator of Hazardous Waste** (quantity generated per month or accumulated at any one time) (Choose only one of the following three categories.)

- ☐ a. LQG: Greater than 1,000kg (2,200 lbs./mo.) of non-acute hazardous waste; or
- ☒ b. SQG: 100 to 1,000kg/mo (220-2,200 lbs./mo.) of non-acute hazardous waste; or
- ☐ c. CESQG: Less than 100kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities. (Mark all that apply)

- ☐ d. United States Importer of Hazardous Waste
- ☐ e. Mixed Waste (hazardous and radioactive) Generator

For items 2 through 6, mark all that apply.

- ☐ 2. **Transporter of Hazardous Waste**
- ☐ 3. **Treater, Storer, or Disposer of Hazardous Waste (at your site).** Note: A hazardous waste permit is required for this activity.
- ☐ 4. **Recycler of Hazardous Waste (at your site).** Note: A hazardous waste permit may be required for this activity.
- ☐ 5. **Exempt boiler and/or Industrial Furnace**
- ☐ a. Small Quantity On-Site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption
- ☐ 6. **Underground Injection Control**

**B. UNIVERSAL WASTE ACTIVITIES**1. **Large Quantity Handler of Universal Waste** (accumulate 5,000kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (Mark all boxes that apply):

	GENERATE	ACCUMULATE
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>

☐ 2. **Destination Facility for Universal Waste.** Note: A hazardous waste permit may be required for this activity.**C. USED OIL ACTIVITIES (MARK ALL BOXES THAT APPLY.)**1. **Used Oil Transporter - Indicate Type(s) of Activity(ies)**

- ☐ a. Transporter
- ☐ b. Transfer Facility

2. **Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)**

- ☐ a. Processor
- ☐ b. Re-refiner

☐ 3. **Off-Specification Used Oil Burner**4. **Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)**

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

**VIII. Description of Regulated Waste Activity (Use Additional Sheets if Necessary)**A. **Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). For waste codes (see 40 CFR 261.20 - 261.24 or 40 CFR 261.31 - 261.33) or contact DNR's Outreach and Assistance Center for a copy of waste code list at 1-800-361-4827.

2002	0006	0007	0039			

b. **Waste Code for State-Regulated (i.e., non-Federal) Hazardous Waste.** Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use additional page if more spaces are needed for waste codes.


**IX. North American Industry Classification System (NAICS) Code(s)**Website at <http://www.census.gov/epcd/naics02> for NAICS code list.

A. 336391	B. 333415	C.	D.
-----------	-----------	----	----

DESCRIBE BUSINESS ACTIVITY

Manufacture of heat transfer equipment using aluminum and steel.

**X. Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

SIGNATURE (ORIGINAL INK REQUIRED)

NAME AND OFFICIAL TITLE (TYPE OR PRINT)

DATE SIGNED

Gary A. Fahl

EH&amp;S Officer Gary A. Fahl

9/27/04



# HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

0451

se print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M 9 0 9 5 2 4 3 9 9 5 1 0 0 2 3 5		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address MODINE HEAT TRANSFER INC SUNSET DR CAMDENTON MO 65020-0636						A. State Manifest Document Number <b>CWMA</b> 907932							
4. Generator's Phone ( 573 ) 346-5696						B. State Generator's ID							
5. Transporter 1 Company Name Tri state Motor Transit CO						6. US EPA ID Number M 0 2 0 9 5 0 3 8 9 9 8							
7. Transporter 2 Company Name						8. US EPA ID Number							
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459						10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. <b>RG, HAZARDOUS WASTE, SOLID, N. O. S, 9, NA3077, III (F006)</b>						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vo		1. Waste No.	
Disposal Approval # _____ CWM Profile # <b>AD7503</b>						001		DF		0038		P F006	
b. _____													
Disposal Approval # _____ CWM Profile # _____													
c. _____													
Disposal Approval # _____ CWM Profile # _____													
d. _____													
Disposal Approval # _____ CWM Profile # _____													
J. Additional Descriptions for Materials Listed Above a. <b>AD7503 F006 ERG-171</b>						K. Handling Codes for Wastes Listed Above a. _____ c. _____ b. _____ d. _____							
State of Generation <b>MISSOURI</b>													
15. Special Handling Instructions and Additional Information Purchase Order # <b>354-27109</b> TRAILER LIC # <b>HQ 32692 OREGON</b> Work Order # _____ EMERGENCY CONTACT: <b>(800) 424-9300</b>													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name <b>DONAVON MANS</b>						Signature <i>Donavon Mans</i>		Month Day Year <b>01/30/91</b>					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Earl Rachal</b>						Signature <i>Earl Rachal</i>		Month Day Year <b>01/30/91</b>					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature		Month Day Year					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>Nancy Xamser</b>						Signature <i>Nancy Xamser</i>		Month Day Year <b>02/09/91</b>					



Modine Manufacturing Company  
1500 DeKoven Avenue  
Racine, Wisconsin 53403 USA

## ***FACSIMILE MESSAGE***

**Date:** February 24, 2006

**From:** T.S. Sanicola

---

---

**Attn:** Dan Davis

**Company:** Modine - Camdenton

**c:**

**Fax Number:**

**RE:** WWTS Sludge TCLP Analysis

**Modine Environmental Fax No.:** 262/636-1826  
**Modine Phone Number:** 262/636-1200

---

---

Enclosed is the most recent WWTS sludge TCLP analysis for Camdenton. The analysis shows that the sludge is non-hazardous but does show some detections for cadmium and chromium (D006 and D007 wastes). If you have any questions, please call.

A handwritten signature in cursive script, appearing to read "T.S. Sanicola".

T.S. Sanicola

**Total Number of Pages**  
**(including this transmission page)**

3

ATTACHMENT 8 Page 1 of 3

**Internal  
Memorandum**

Racine

**From:** Karen Lewis**Date:** May 7, 2003**To:** M. Lewis  
T. Sanicola**Subject:** Reactive Sulfide and Reactive Cyanide  
Analysis**Cc:** File

Sulfide, reactive and Cyanide, reactive were not analyzed. Reason being, in April 1998, the EPA withdrew the July 1985 guidance describing certain threshold levels for cyanide and sulfide-bearing wastes and methods for evaluating such wastes. The EPA does not recommend use of the interim threshold levels or methods to determine if a waste is hazardous based on the characteristic of reactivity. Furthermore, the regulations do not require specific test methods for any of these properties. Based on generator knowledge and corporate knowledge of the manufacturing process and materials used at Modine-Camdenton, this waste is known to be free of reactive cyanide and sulfide.



CHEMICAL AND METALLURGICAL  
LABORATORY REPORT

## Waste Analysis Report

To: M. Lewis

J. Sanicola

Report No:

12116

Date:

05/07/2003

Control No: 8010

Page 1 of 1

Cc: File

Plant: Camdenton

LV ID: HWASTE-03-00012

Login Date: 03/13/2003

Sample Date: 03/10/2003

Source: WWTS

Test		Result	Tested	MDL	LOQ	Method
Density	lb/gal	9.1	05/07/2003			LP-W3
pH (10% Solution)		7.3	05/07/2003		2	9045C
Silver, TCLP	mg/L	<0.011	05/07/2003	0.011	0.034	7761
Arsenic, TCLP	mg/L	<0.074	05/07/2003	0.074	0.24	7060A
Barium, TCLP	mg/L	0.1	05/07/2003	0.00064	0.0021	6010B
Cadmium, TCLP	mg/L	(0.0070)	05/07/2003	0.0023	0.0076	6010B
Chromium, TCLP	mg/L	0.044	05/07/2003	0.0026	0.0086	6010B
Mercury, TCLP	mg/L	<0.00077	05/07/2003	0.00077	0.0026	7471A
Lead, TCLP	mg/L	(0.0060)	05/07/2003	0.0047	0.016	6010B
Selenium, TCLP	mg/L	<0.055	05/07/2003	0.055	0.18	7740

## Definitions

MDL: Method Detection Limit.

LOQ: Limit of Quantitation.

Tested: Date sample was tested.

Reference: Test Methods for Evaluating Solid Waste, Update III of SW-846, 12/96.  
Standard Methods for the Examination of Water and Wastewater\*, 19th edition, 1995  
American Society for Testing and Materials, West Conshohocken, PA

Note: An "I" denotes a result that exceeds published regulatory limit.  
Value enclosed in ( ) is between LOQ and MDL.

## Remarks:

Water Reactivity: slowly effervesces in water  
Phase: solid  
Solubility: since solid, not applicable  
Color: grayish-brown with some white  
  
See attached memo for sulfide and cyanide reactivity.

Analyst:

Karen Lewis

**CTLaboratories**

1230 Lange Court  
 Baraboo, WI 53913-3109  
 Phone: (800) 228-3012  
 Fax: (608) 356-2766  
 www.ctllaboratories.com

**ANALYTICAL REPORT**

Page 1 of 1

MODINE MANUFACTURING CO.  
 JIM KINSCHER  
 1500 DEKOVEN AVENUE  
 RACINE, WI 53403

Copy: SEE LIST

Project Name:  
 Contract #: 1952  
 Project #:  
 Folder #: 45193  
 Purchase Order #:  
 Arrival Temperature: See COC  
 Report Date: 2/7/2005  
 Date Received: 1/27/2005  
 Reprint Date:

CTI LAB#:		297199	Sample Description:		NOCOLOK FURNACE WASTE				Sampled:		1/8/2005
Analyte	Result	Units	LOD	LOQ	Dilution	Qualifier	Prep Date	Analysis Date	Analyst	Method	
Metals Results											
TCLP Cadmium	0.245	mg/L	0.00054	0.0018	1.0		2/2/2005	2/4/2005	NAH	EPA 6010B	
TCLP Chromium	0.0166	mg/L	0.0027	0.0089	1.0		2/2/2005	2/4/2005	NAH	EPA 6010B	

**Notes regarding entire Chain of Custody:**

Notes: \* Indicates Value in between LOD and LOQ.

All samples were received intact and properly preserved unless otherwise noted. The results reported relate only to the samples tested. This report shall not be reproduced, except in full, without written approval of this laboratory. The Chain of Custody is attached.

This report satisfies the requirements of your project but has not been prepared to comply with NELAP reporting requirements.

Submitted by:           PML          

Pat M. Lettner  
 Project Manager  
 608-356-2760

WI DNR Lab Certification Number: 157066030  
 DATCP Certification Number: 105-000289  
 LA NELAP Certification Number: 04091



Solid sample results reported on a Dry Weight Basis

CHEMICAL AND METALLURGICAL  
LABORATORY REPORT

## Waste Analysis Report

To: M. Lewis

Report No: 9633

Date: 03/06/2001

Control No: 5957

Page 1 of 1

Cc: File

Plant: Camdenon

LV ID: HWASTE-01-00006

Login Date: 02/26/2001

Sample Date: 02/13/2001

Source: Nocolok Grinding Filters

Test		Result	Tested	MDL	LOQ	Method
Density	lb/gal	2.1	03/06/2001			LP-W3
Barium, TCLP	mg/L	1.6	03/06/2001	0.0003	0.001	6010B
Cadmium, TCLP	mg/L	0.0090	03/06/2001	0.001	0.0033	6010B
Chromium, TCLP	mg/L	0.19	03/06/2001	0.0015	0.0049	6010B
Lead, TCLP	mg/L	0.040	03/06/2001	0.0013	0.0043	6010B

## Definitions

MDL: Method Detection Limit.

LOQ: Limit of Quantitation.

Tested: Date sample was tested.

Reference: Test Methods for Evaluating Solid Waste, Update III of SW-846, 12/96.  
Standard Methods for the Examination of Water and Wastewater, 19th edition, 1995  
American Society for Testing and Materials, West Conshohocken, PA

Note: An "\*" denotes a result that exceeds published regulatory limit.

Remarks:

Analyst:

Karen Lewis *JK*

# SAFETY-DATA-SHEET (91/155/EWG)

Be valid: 01.01.2002 Version: A1-FLUX 2805 007  
Replace version by: 22.11.1999  
Printdate: 19.08.2003 Side: 01/05

## 1. Substance/Preparation and Company Name

### Information about product

Commercial product name: **Al-FLUX 2805**

### Information about manufacturer/supplier

Name: **FLUX** Schweiß- und Lötstoffe GmbH  
Department: Management  
Street: Dieselstraße 26  
Place: D - 30827 Garbsen ( Germany )  
Telephone: (0) 51 31 / 69 17  
Fax: (0) 51 31 / 46 50 48  
Emergency information: (0) 51 31 / 67 33

## \* 2. Ingredients/Information about components

### Chemical characterization (Preparation)

#### Description

Controlled-Atmosphere-Brazing-Flux for brazing of aluminium-materials.

#### Type of substance

Type : F-LH2 in accordance with DIN 8511 part 1 edition Juli 1985

#### Ingredients

Potassiumfluoroaluminate	CAS-No.:	60304-36-1
	EINECS-No.:	262-153-1

## \* 3. Possible risks

### Danger symbol

**Xi**

Irritant

### R-Phrases

R36:

Irritant for eyes

R52/53:

harmful to waterorganisms, harmful effects are possible whilst staying in lakes and rivers for longer terms.

Pay attention to the usual precaution dealing with chemicals.

Possible risk could result from irritating to eyes, skin, respiratory tract and mucous membrane.

In case of repeated and longer lasting exposition there's a risk of sore throat, nosebleed and chronic bronchitis.

Don't breath dust.

## 4. Emergency and first aid procedures

### After inhalation

After inhalation of a lot of substance-quantity wash out mouth- and nosecave carefully.

Are there continuous problems, visit a doctor.

### After skin contact

Wash with water and soap carefully.

# SAFETY-DATA-SHEET (91/155/EWG)

Be valid: 01.01.2002  
Replace version by: 22.11.1999  
Printdate: 19.08.2003

Version: AI-FLUX 2805 007  
Side: 02/05

## After eye contact

With open eyelid wash out with water carefully (eye bath). Are there continuous problems, visit a doctor.

## After ingestion

If it is necessary drink a lot of water, to induce vomiting (only by full awareness), visit a doctor.

## **5. Measures in case of fires**

### Suitable fire extinguishing media

The product is not flammable, in case of fire in the surrounding you can use all fire extinguishing media: water fog, extinguishing foam or powder, carbon dioxide.

### Unsuitable fire extinguishing media

### Special protection measures

In case of fire take breathing apparatus independent from circulating air.

## \* **6. Spill, leak and disposal procedures**

### Personal precautions

You need sufficient ventilation, avoid dust development

### Environment precautions

The product does not reach at a public sewage system

### Methods for cleaning

Sweep together, but avoid strong dust-development, gather in a suitable container.

As solid material deposit at a special waste dump.

## \* **7. Special handling and storage procedures**

### **Using**

#### Tips for safe working

Suck off any dust. During dealing with and using the product, in any kind, pay attention to normal regulations for industrial hygiene, e.g.: wash with normal tap water, change dirty clothes, eating/drinking/smoking at the working place is forbidden.

Please wash hands before break and finish work.

### **Storage**

In undamaged original-package of any kind, in a dry, well ventilated place, nearly unlimited storable.

Don't put together with acids, avoid contact with acids.

### Others

Close original-package tightly

### VCI-storage-classification

13/11

## \* **8. Exposition restriction and personal protection clothing**

### **Personal protection equipment**

#### General protection and hygiene procedures

For warranty of the best skin protection: use a very grease soap and a handcream for skin care.

Pay attention to the normal regulations for industrial hygiene. Don't inhale dust. Wash hands before break and finish work. Eating/drinking/smoking at the working place is forbidden.



# SAFETY-DATA-SHEET (91/155/EWG)

Be valid: 01.01.2002  
Replace version by: 22.11.1999  
Printdate: 19.08.2003

Version: Al-FLUX 2805 007  
Side: 03/05

**Breathing protection:** yes / if the exhauster is not enough or if you have contact over prolonged periods

**Eye-protection:** yes / goggles

**Skin-protection:** yes / gloves

**Other:** yes / right industrial protection clothes

The person for the industrial safety has to control and ensure the compliance of the regulations.

## 9. Physical and chemical characteristics

Form: Powder  
Colour: white  
Odour: neutral

		Value/Area/Unit
<u>Physical data</u>		
Melting point/-area	Effective temperature	550 - 600 °C
Boiling point/-area		n.b. °C
Flash point		n.a. °C
Inflammation		n.a. °C
Ignition temperature		n.a. °C
Selfflammation		n.a. °C
Explosion limits		
Dustexplosion		
	Lower	n.b.
	Upper	n.b.
Vapor pressure	(20°C)	n.a. mbar
Density	(20°C)	n.b. g/cm <sup>3</sup>
Bulkdensity	(20°C)	approx 500 kg/ m <sup>3</sup>
Solubility	(20°C)	nearly insoluble in water
pH (10 g/l water)	(20°C)	approx. 5 - 7,5 (suspension)
Distributioncoefficient		n.a.
Viscosity	(20°C)	n.a.

## 10. Stability and reactivity

### Thermal decomposition

No decomposition as directed use. Decompositionstemperature > 720 °C.

### Hazardous decomposition

In contact with strong acid => HF

## \* 11. Information about toxicology

### Acute toxisität

#### Acute oral toxisität

LD50 > 2 g/kg  
Spezies Rat  
Reference Literature

n.a.= not applicable; n.b.= not specific; \* = change

ATTACHMENT 10 Page 3 of 45

# SAFETY-DATA-SHEET (91/155/EWG)

Be valid: 01.01.2002  
Replace version by: 22.11.1999  
Printdate: 19.08.2003

Version: AI-FLUX 2805 007  
Side: 04/05

## Acute dermal toxisität

LD50 > 2 g/kg  
Spezies Rabbit  
Reference Literature

## **Irritant/corrosive effects**

### Irritant effect at the skin

Spezies Rabbit  
Result Not irritant  
Reference Literature

### Irritant effect at the eye

Spezies Rabbit eye  
Result Irritant  
Reference Literature

## \* 12. Information about ecology

### **Ecotoxicological effects**

#### Daphnientoxizität

EC50 22,8 mg/l  
Spezies Daphnia magna  
Exposition 48 h  
Reference literature

The product does not reach uncontrolled at a public sewage system.  
Chemical flakes eliminate it in water.

## 13. Information about disposal

### Product

As solid material deposit at a prescribed place.

### Waste-disposal-no.

06-0305 (dry-substance, EURO-Norm)

## 14. Information on transport

*The product is not subject to GefStoffV*

Risk material according to transport regulations

GGVS/GGVE/RID/ADR/IMDG-Code/ICAO/IATA

No

### Other information

Transport per mail is allowed.

# SAFETY-DATA-SHEET (91/155/EWG)

Be valid: 01.01.2002  
Replace version by: 22.11.1999  
Printdate: 19.08.2003

Version: AI-FLUX 2805 007  
Side: 05/05

## 15. Regulations

<u>Danger symbol</u>	<b>Xi</b>	Irritant
<u>R-Phrases</u>	R36: R52/53:	Irritant for eyes harmful to waterorganisms, harmful effects are possible whilst staying in lakes and rivers for longer terms.
<u>S-Phrases</u>	S26: S36/37/39:	After eye contact wash immediately with water carefully, visit a doctor. During working take right industrial protection clothes, gloves and goggles

## National regulations

Classification of water endangering  
WGK = 1

Other: ZH 1/161 Merkblatt: Fluorwasserstoff, Flußsäure und anorganische Fluoride (M005)

## 16. Other Information

The points which are marked with \* got changed in opposite to the last version.

With the preceding informations, which are correspond to our knowledge and experience of today, we want to describe our product in view of any safety-requirements.  
We combined with it no quality descriptions and/or characteristic-assurances.

n.a.= not applicable; n.b.= not specific; \* = change


ATTACHMENT 10 Page 5 of 2



D.A.Davis@na.modine.com  
02/24/2006 10:41 AM

To Jamal Lewis/ENSV/R7/USEPA/US@EPA  
cc T.S.Sanicola@na.modine.com,  
J.P.Blatchford@na.modine.com  
bcc

Subject EPA Visit to Modine Camdenton Missouri (2-23-06)

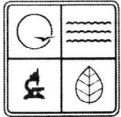
History:  This message has been replied to.

Good day Mr. Lewis,

Per our discussion about the option to change our confidentiality status, please change our position to non-confidential. After speaking with our Principal Environmental Engineer (Tom Sanicola) at our corporate office, he said one of the reasons we would be concerned about confidential materials would have been if you had taken several pictures of our process. Your visit did not compromise our process confidentiality. If you need anything else, please do not hesitate to contact me.

Regards,

Dan Davis  
Manufacturing Engineer  
Modine Manufacturing Company, Inc.  
221 Sunset Drive  
Camdenton, MO 65020  
573-346-5693 ext. 3135



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM  
**USED OIL GENERATOR**  
**INSPECTION RECORD AND CHECKLIST**

NAME <b>MODINE MANUFACTURING COMPANY</b>		DATE <b>23-24 FEB 00</b>	EPA I.D. NUMBER <b>MOD062439351</b>
ADDRESS <b>221 SUNSET DR.</b>		MO I.D. NUMBER <b>1</b>	
CITY <b>CAMDENTON</b>	NUMBER OF EMPLOYEES <b>~300</b>	YEARS AT SITE <b>16</b>	TELEPHONE NUMBER

FACILITY REPRESENTATIVE(S), TITLE(S)

**DAN DAVIS, MANUFACTURING, ENGINEER**

**DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT**

**SEE REPORT**

**A. USED OIL STORAGE**

	COMMENTS
1. <input checked="" type="checkbox"/> Used oil is managed properly and not disposed of into the environment or cause a public nuisance - 10 CSR 25-11.279(2)(B)4.B.	
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(1).	
3. <input checked="" type="checkbox"/> Containers storing used oil are not leaking - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(2).	
4. <input checked="" type="checkbox"/> Containers/aboveground tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(1).	
5. <input checked="" type="checkbox"/> Fill pipes used to transfer oil into underground storage tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(2).	
6. <input checked="" type="checkbox"/> Containers/tanks which are exposed to rainfall are closed - 10 CSR 25-11.279(2)(C)6.	
7. <input checked="" type="checkbox"/> Clean up any spills or leaks of used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(d).	
8. <input checked="" type="checkbox"/> Mixtures of used oil and hazardous waste are managed according to state hazardous waste regulations - 10 CSR 25-11.279(2)(B)2.	

**B. ON-SITE BURNING**

	COMMENTS
1. <input checked="" type="checkbox"/> Burn only their own used oil or used oil from DIY'ers or exempt farmers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(a) as amended by 10 CSR 25-11.279(2)(A)1.	
2. <input type="checkbox"/> Burn only in space heaters with design capacity < .5 million BTU/hr - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(b).	
3. <input type="checkbox"/> Combustion gases from the heater are vented to the ambient air - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(c).	

**C. OFF-SITE SHIPMENTS TO APPROVED COLLECTION CENTERS**

	COMMENTS
1. <input checked="" type="checkbox"/> Used oil is transported by transporters who have obtained EPA identification numbers unless one of the following is met - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24.	
<b>40 CFR 279.24(a)</b>	
2. <input checked="" type="checkbox"/> Transports used oil in a vehicle owned by the generator or owned by an employee of the generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(1).	
3. <input type="checkbox"/> Transports no more than 55 gallons of used oil at any time - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(2).	
4. <input type="checkbox"/> Transports the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(3).	
<b>OR 40 CFR 279.24(b)</b>	
5. <input checked="" type="checkbox"/> Transports the used oil to an aggregation point that is owned and/or operated by the same generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(b)(3).	
<b>OR 40 CFR 279.24(c)</b>	
6. <input type="checkbox"/> Used oil is reclaimed under a contractual agreement (tolling arrangement) - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(c).	

**CHECKLIST KEY**

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable.

An item emphasized by a black line on the left is a serious deviation from the requirements (Class I Violation).

An unemphasized item is a significant deviation from the requirements (Class II Violation unless conditions warrant Class I).

COMMENTS

INSPECTOR'S SIGNATURE

DATE

MO 780-1890 (10-04)



## PHOTO LOG

**Facility Name / City:** Modine Manufacturing Company  
Camdenton, Missouri

**Facility ID #:** MOD062439351

**Date:** February 23-24, 2006

**Photographer:** Jamal Lewis

**Type of Camera:** Canon Power Shot G5, Serial #:6821104561

**Digital Recording Media:** Flashcard

**All digital photos were copied by:** Jamal Lewis on March 17, 2006

**All digital photos were copied to:** CD-R

**Original copy is stored in:** CD-R. Digital photos were downloaded to CD-R all by Jamal Lewis.  
No changes were made in the original image files prior to storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (IMG_xxx.jpg)	Description
1	Jamal Lewis	3/23/05		001	Part in carrier being sprayed with flux and drained prior to baking in furnace.

# Modine Manufacturing Company

February 23-24, 2006

1 Photo By:

Jamal Lewis



Photo 1, East Side of Plant, Facing NW: Part in carrier being sprayed with flux and drained prior to baking in furnace.